



INVENTORY CONTROL - SUSPICIOUS ORDER POLICY

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Policy Owner: Matt Rogos	Department: HBC Service Co.
Reference(s): HBC-PAP001-001	

PURPOSE/OBJECTIVE:

To identify, investigate, record, and report suspicious pharmaceutical product orders

SCOPE:

This policy applies to:

- All HBC TMs who have access to the HBC pharmacy room.

POLICY:

- Identified individuals from Giant Eagle Sourcing, Pharmacy Compliance, and HBC Team Members (TMs) must review pharmacy customer orders and order trends on a regular and for - cause basis to identify suspicious drug orders
- Suspicious orders are blocked and reported to the appropriate regulatory authority within the specified time frame as required
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PROCEDURES:

Reporting suspicious prescription product orders

- Giant Eagle and HBC team members review customer orders and order history trends to identify suspicious drug orders
- Suspicious order criteria include, but are not limited to:
 - Purchases over a defined time period that exceed a pre-determined threshold
 - Orders of unusual quantities compared to a customer's order history
 - Unique pattern of orders that differs from similar customers
 - Orders received outside of the normal pharmacy customer ordering process
- identified orders are investigated to determine if the order is suspicious or legitimate
- Legitimate orders are released for processing and delivery to the customer

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- Suspicious orders are blocked and reported to the applicable regulatory authorities within the specified time frame as required
 - Board of Pharmacy and FDA within three (3) business days
 - DEA (if controlled substance) upon determination
- HBC prepares and communicates any history of suspicious orders to the GE Pharmacy team as requested.
- HBC retains the records of the investigation and outcome for six (6) years

COMPLIANCE:

Non-compliance with this policy will result in progressive discipline up to and including termination in compliance with Human Resource guidelines